

# **EXHIBIT A**

July 16, 2018

Invoice No. 3048168  
0418 / 054541  
W1J

UTC Climate Controls & Security  
17900 BeeLine Hwy.  
Jupiter, FL 33478  
Attn: Craig S. Taschner – Sr. Counsel - Litigation

For legal services rendered through June 30, 2018

**Christopher Kaps (IN EEOC Charge No. 470-2017-01769) (Port) - 054541-000006**

**Jonathan Burrs v. etc. (Section 1981) (Portfolio) - 054541-001100**

<b><u>Date</u></b>	<b><u>Timekeeper</u></b>	<b><u>Hours</u></b>	<b><u>Description</u></b>
06/11/18	T. Reynolds IV	1.30	(To be moved to Burrs 3) Further analysis of Burrs' third complaint, comparing allegations to those from his EEO complaint (Burrs 2) and analyzing affect on third complaint of orders in Burrs 2 granting motion for judgment on the pleadings and summary judgment.
06/12/18	T. Reynolds IV	0.50	(Burrs 3) Correspondence with C. Taschner regarding service of plaintiff's third complaint and strategy for response; analyze potential service issues.
06/18/18	T. Reynolds IV	1.50	(To be moved to Burrs 3) Continue researching res judicata arguments for motion to dismiss Section 1981 claim.

**Total Hours This Matter** 3.30

**Total Fees This Matter** \$907.50

BILLS ARE DUE AND PAYABLE UPON RECEIPT  
THIS STATEMENT DOES NOT INCLUDE EXPENSES NOT YET RECEIVED BY THIS OFFICE  
WHICH MIGHT HAVE BEEN INCURRED DURING THE PERIOD COVERED BY THIS BILLING

**Timekeeper Summary**

T. Reynolds IV - 3.30 hours at \$275.00 per hour = \$907.50

**Total Fees And Disbursements This Matter** \$907.50

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# **EXHIBIT B**

August 10, 2018

Invoice No. 3070378  
0418 / 054541  
W1J

UTC Climate Controls & Security  
17900 BeeLine Hwy.  
Jupiter, FL 33478  
Attn: Craig S. Taschner – Sr. Counsel - Litigation

For legal services rendered through July 31, 2018

**Jonathan Burrs v. etc. (Section 1981) (Portfolio) - 054541-001100**

<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Description</u>
06/25/18	T. Reynolds IV	0.20	Review docket report; correspondence with C. Taschner regarding issuance of summons.
07/09/18	T. Reynolds IV	0.40	Correspondence with C. Taschner regarding returns of service for summons served on UTC and Walter Kidde.
07/14/18	T. Reynolds IV	0.20	Correspondence with plaintiff to arrange call to discuss waiver of service and extension of deadline for UTC to answer complaint.
07/15/18	T. Reynolds IV	0.30	Telephone conference with plaintiff regarding waiver of service from Walter Kidde and extension of time for UTC to answer complaint; correspondence with plaintiff confirming waiver of service and extension of time to answer complaint.
07/16/18	T. Reynolds IV	0.30	Correspondence with C. Taschner regarding extension of deadline to respond to complaint.
07/17/18	B. Briggs	0.40	Review motion for extension, waiver of service and order on motion for extension; confer with T. Reynolds regarding same.
07/17/18	T. Reynolds IV	4.50	Prepare consent motion to extend deadline to respond to complaint and proposed order granting same; prepare waiver of service; prepare corporate disclosure statements for UTC and Walter Kidde; correspondence with C. Taschner requesting review and approval of extension motion and supporting documents.

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<u>Date</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Description</u>
07/18/18	T. Reynolds IV	1.80	Finalize and file consent motion for extension of time to respond to plaintiff's complaint and accompanying documents; finalize waiver of service; correspondence with plaintiff regarding all filings; correspondence with C. Taschner regarding same; review court order granting extension; correspondence with C. Taschner regarding same.
07/19/18	B. Briggs	0.40	Review motion to transfer venue; confer with T. Reynolds regarding response to same.
07/19/18	T. Reynolds IV	6.50	Analyze plaintiff's motion to transfer venue; review case law discussing standard for transferring venue; correspondence with C. Taschner regarding same; analyze case law regarding motions for sanctions and imposition of pre-filing injunctions; analyze cases discussing Rule 11 sanctions in instances where plaintiff brings suit based on previously dismissed claims; begin developing strategy for responding to plaintiff's motion to transfer venue and for seeking appropriate sanctions; prepare and file notices of appearance; correspondence with plaintiff forwarding notices of appearance.
07/25/18	B. Briggs	0.20	Confer with T. Reynolds regarding motion to dismiss and motion for sanctions.
07/25/18	T. Reynolds IV	0.50	Review strategy for responding to complaint and motion to transfer venue, including Rule 11 motions for sanctions.
07/30/18	T. Reynolds IV	0.30	Correspondence to plaintiff requesting call to discuss his motion to transfer venue; correspondence with C. Taschner regarding timing of initial case assessment and strategy for responding to motion to transfer venue.
07/31/18	T. Reynolds IV	2.30	Prepare consent motion for extension of time to respond to plaintiff's motion to transfer venue; correspondence with C. Taschner regarding same.
<b>Total Hours This Matter</b>		18.30	

**Total Fees This Matter** \$5,342.50

**Timekeeper Summary**

B. Briggs	-	1.00	hours at	\$585.00	per hour =	\$585.00
T. Reynolds IV	-	17.30	hours at	\$275.00	per hour =	\$4,757.50

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WHICH MIGHT HAVE BEEN INCURRED DURING THE PERIOD COVERED BY THIS BILLING

**Total Fees And Disbursements This Matter**

**\$5,342.50**

BILLS ARE DUE AND PAYABLE UPON RECEIPT  
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WHICH MIGHT HAVE BEEN INCURRED DURING THE PERIOD COVERED BY THIS BILLING

# **EXHIBIT C**



October 23, 2018

Invoice No. 3118347  
0418 054541 / 054541-001100  
W1ST

UTC Climate Controls & Security  
17900 BeeLine Hwy.  
Jupiter, FL 33478  
Attn: Craig S. Taschner – Sr. Counsel - Litigation

For legal services rendered through September 30, 2018

**Jonathan Burrs v. etc. (Section 1981) (Portfolio) Collaborati/UTX0091776**

<b><u>Date</u></b>	<b><u>Disbursements</u></b>	<b><u>Value</u></b>
	<b><u>Courier/Messenger</u></b>	
08/29/18	Courier/Messenger Inv#: 630041580 Date Sent: 08/29/2018 Sender: Rose Woolson Airbill: 773097194118 Jonathan Burrs, Sr. 118 Pangborn Blvd HAGERSTOWN, MD 21740	17.24
09/14/18	Courier/Messenger Inv#: 631468913 Date Sent: 09/14/2018 Sender: Rose Woolson Airbill: 773225888232 Jonathan R. Burrs 118 Pangborn Boulevard HAGERSTOWN, MD 21740	34.84
<b>Total Disbursements</b>		<b><u>\$52.08</u></b>
<b>Total Fees And Disbursements This Statement</b>		<b><u>\$52.08</u></b>

# **EXHIBIT D**

October 31, 2018

Invoice No. 3129244  
0418 054541 / 054541-001100  
W1ST

UTC Climate Controls & Security  
17900 BeeLine Hwy.  
Jupiter, FL 33478  
Attn: Craig S. Taschner – Sr. Counsel - Litigation

For legal services rendered through September 30, 2018

**Jonathan Burrs v. etc. (Section 1981) (Portfolio) Collaborati/UTX0091776**

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
08/01/18	T. Reynolds IV	L250	Correspondence with plaintiff requesting his consent to extension of time to respond to motion to transfer; finalize and file consent motion for extension; correspondence with plaintiff transmitting same; review court order granting extension; correspondence with C. Taschner regarding same.	1.20	330.00
08/03/18	T. Reynolds IV	L250	Begin preparing motion for sanctions under Rule 11 as to plaintiff's complaint.	3.50	962.50
08/06/18	T. Reynolds IV	L250	Continue preparing motion for sanctions as to plaintiff's complaint, including discussion of previous two cases decided in favor of Walter Kidde and analysis of recent cases regarding res judicata and collateral estoppel.	4.50	1,237.50
08/08/18	T. Reynolds IV	L250	Correspondence with plaintiff requesting call to discuss complaint and motion to transfer; continue preparing motion for sanctions as to complaint, including updated case law citations regarding awards of sanctions in similar matters.	3.30	907.50
08/09/18	B. Briggs	L120	Review and revise motion for sanctions; confer with T. Reynolds regarding same.	0.70	409.50
08/09/18	T. Reynolds IV	L250	Revise motion for sanctions as to complaint; correspondence with C. Taschner requesting review and approval of same; review status of plaintiff's petition for certiorari.	1.00	275.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
08/13/18	T. Reynolds IV	L250	Revise motion for sanctions as to complaint based on comments from C. Taschner; prepare letter to plaintiff to accompany motion for sanctions.	4.70	1,292.50
08/14/18	B. Briggs	L120	Review sanctions cover letter; confer with T. Reynolds regarding same.	0.30	175.50
08/14/18	T. Reynolds IV	L250	Finalize and serve letter and motion for sanctions as to plaintiff's complaint.; correspondence with C. Taschner regarding same.	1.50	412.50
08/21/18	T. Reynolds IV	L250	Begin preparing motion for sanctions as to plaintiff's motion to transfer venue.	0.80	220.00
08/22/18	T. Reynolds IV	L250	Prepare response to plaintiff regarding his request for an extension of time to respond to Defendants' motion for sanctions as to his complaint; continue procedural background section of motion for sanctions as to plaintiff's motion to transfer venue and begin preparing legal arguments.	6.50	1,787.50
08/23/18	T. Reynolds IV	L250	Correspondence from plaintiff regarding motion for sanctions as to his complaint; continue preparing arguments and citations to authority for motion for sanctions as to plaintiff's motion to transfer venue.	6.50	1,787.50
08/27/18	T. Reynolds IV	L250	Correspondence to C. Taschner requesting review and approval of proposed motion for sanctions as to plaintiff's motion to transfer.	0.20	55.00
08/28/18	T. Reynolds IV	L250	Correspondence with C> Taschner regarding motion for sanctions as to plaintiff's motion to transfer venue; begin preparing letter to plaintiff regarding motion for sanctions as to motion to transfer.	1.30	357.50
08/29/18	T. Reynolds IV	L250	Revise motion for sanctions as to motion to transfer; prepare letter to plaintiff regarding motion for sanctions as to motion to transfer; review compilation of case law and code sections to accompany letter to plaintiff; correspondence with C. Taschner regarding letter sent to plaintiff.	2.70	742.50
09/04/18	T. Reynolds IV	L250	Analyze plaintiff's email response to proposed motion for sanctions as to his complaint; correspondence with C. Taschner regarding same.	0.50	137.50
09/07/18	T. Reynolds IV	L210	Begin preparing introduction, mature of the matter, relevant facts and questions presented for motion to dismiss.	3.00	825.00
09/09/18	T. Reynolds IV	L210	Begin preparing legal arguments for motion to dismiss.	1.60	440.00

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
09/10/18	T. Reynolds IV	L210	Begin preparing legal arguments for motion to dismiss regarding res judicata and collateral estoppel.	5.50	1,512.50
09/11/18	T. Reynolds IV	L210	Correspondence with plaintiff regarding request for extension to respond to complaint; begin preparing legal arguments for motion to dismiss as to race and hostile work environment claims.	4.00	1,100.00
09/12/18	T. Reynolds IV	L210	Follow up correspondence to plaintiff regarding request for extension; prepare motion for extension; prepare legal arguments for motion to dismiss regarding intentional and negligent infliction of emotional distress; revise nature of matter and statement of relevant facts; revise all legal arguments that plaintiff's claims are barred as a matter of law; revise all legal arguments that plaintiff has failed to state a claim against defendants.	7.00	1,925.00
09/13/18	T. Reynolds IV	L210	Correspondence with C. Taschner regarding motion to dismiss; revise memorandum in support of motion to dismiss;	0.50	137.50
09/14/18	T. Reynolds IV	L210	Prepare cover motion for motion to dismiss; finalize and file motion, memorandum in support, and all exhibits, including documents filed in prior cases and unreported opinions; correspondence with plaintiff regarding same.	3.50	962.50
09/17/18	T. Reynolds IV	L210	Correspondence with C. Taschner regarding motion to dismiss.	0.10	27.50
09/18/18	T. Reynolds IV	L120	Correspondence with C. Taschner regarding court's Roseboro letter to plaintiff.	0.10	27.50
09/20/18	B. Briggs	L120	Attention to motions and responses; communicate with T. Reynolds regarding same.	0.20	117.00
09/20/18	T. Reynolds IV	L250	Prepare opposition to plaintiff's motion to transfer venue; correspondence with C. Taschner requesting review and approval of same; revise opposition brief and compile list of all exhibits.	4.50	1,237.50
09/21/18	T. Reynolds IV	L250	Finalize and file opposition to plaintiff's motion to transfer venue; correspondence with plaintiff regarding same; correspondence with C. Taschner regarding same.	1.40	385.00
<b>Total Hours</b>				<b>70.60</b>	
<b>Total Fees</b>					<b>\$19,787.00</b>

**Timekeeper Summary**

B. Briggs	Partner	-	1.20	hours at	585.00	per hour
T. Reynolds IV	Counsel	-	69.40	hours at	275.00	per hour

**Total Fees And Disbursements This Statement** **\$19,787.00**

**Less Unallocated Cash** **(\$19,787.00)**

**Total Amount Due** **\$0.00**

# **EXHIBIT E**

November 21, 2018

Invoice No. 3144131  
0418 054541 / 054541-001100  
W1ST

UTC Climate Controls & Security  
17900 BeeLine Hwy.  
Jupiter, FL 33478  
Attn: Craig S. Taschner – Sr. Counsel - Litigation

For legal services rendered through November 15, 2018

**Jonathan Burrs v. etc. (Section 1981) (Portfolio) Collaborati/UTX0091776**

<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
10/03/18	T. Reynolds IV	L210	Analyze notice regarding plaintiff's first amended complaint.	0.10	27.50
10/04/18	T. Reynolds IV	L210	Initial analysis of plaintiff's first amended complaint.	0.50	137.50
10/08/18	T. Reynolds IV	L210	Analyze redline comparing plaintiff's first amended complaint to his initial complaint.	0.30	82.50
10/09/18	T. Reynolds IV	L250	Analyze text order from court regarding consideration of original motion to dismiss as applicable to plaintiff's first amended complaint; analyze potential additional arguments to be raised; correspondence with C. Taschner regarding same.	1.00	275.00
10/24/18	T. Reynolds IV	L250	Analyze timing requirements for plaintiff's filing in response to motion to dismiss to determine whether filing would be effective as of mailing.	0.40	110.00
10/25/18	T. Reynolds IV	L250	Begin preparing memorandum of law in support of motion for sanctions as to plaintiff's first amended complaint.	0.50	137.50
10/31/18	T. Reynolds IV	L250	Correspondence with C. Taschner regarding status of motion to dismiss; begin preparing memorandum of law in support of motion for sanctions as to plaintiff's complaint.	2.30	632.50
11/01/18	T. Reynolds IV	L250	Continue preparing memorandum in support of motion for sanctions as to plaintiff's complaint.	4.40	1,210.00

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<u>Date</u>	<u>Timekeeper</u>	<u>Task</u>	<u>Description</u>	<u>Hours</u>	<u>Value</u>
11/02/18	T. Reynolds IV	L250	Continue preparing memorandum in support of motion for sanctions; analyze order denying plaintiff's motion to transfer venue; revise motion for sanctions to address plaintiff's response to draft motion and his subsequent first amended complaint; analyze order granting motion to dismiss and dismissing plaintiff's complaint with prejudice; analyze case law addressing filing of motion for sanctions after dismissal and entry of judgment; correspondence with C. Taschner regarding same.	5.30	1,457.50
11/05/18	B. Briggs	L120	Review motion for sanctions; communicate with T. Reynolds regarding same.	0.50	292.50
11/05/18	T. Reynolds IV	L250	Revise motion for sanctions and memorandum in support to account for dismissal of complaint; correspondence with C. Taschner requesting review and approval of same; prepare proposed order; revise motion and memorandum of law to address comments from C. Taschner; prepare exhibits for memorandum of law in support of motion for sanctions.	3.90	1,072.50
11/06/18	T. Reynolds IV	L250	Finalize and file motion for sanctions; correspondence with plaintiff regarding same; correspondence with C. Taschner regarding same.	0.40	110.00
11/08/18	T. Reynolds IV	L250	Outline elements of bill of costs.	0.10	27.50
11/09/18	T. Reynolds IV	L250	Revise bill of costs.	0.10	27.50
11/13/18	T. Reynolds IV	L250	Analyze notice from court to plaintiff regarding motion for sanctions.	0.10	27.50

<b>Total Hours</b>	<b>19.90</b>
<b>Total Fees</b>	<b>\$5,627.50</b>

**Timekeeper Summary**

B. Briggs	Partner	-	0.50	hours at	585.00	per hour
T. Reynolds IV	Counsel	-	19.40	hours at	275.00	per hour

<b>Total Fees And Disbursements This Statement</b>	<b>\$5,627.50</b>
<b>Less Unallocated Cash</b>	<b><u>(\$5,627.50)</u></b>
<b>Total Amount Due</b>	<b><u>\$0.00</u></b>